

Proposal to Directly Award a Public Bus Service Contract to Dublin Bus in 2019

1. Consultation Paper

October 2018

Table of contents

1. Introduction.....	4
1.1 Overview	4
1.2 Background	4
1.3 Legislative background.....	5
1.4 Objectives.....	7
2. Consideration.....	8
2.1 Assessment Stages	8
2.2 Summary of operational and financial performance	8
2.3 Review of Recent Tender Competition	10
2.4 Customer Satisfaction	11
2.5 Integration	11
2.6 Bus Connects and the direct award contract	11
2.7 General Economic Interest.....	13
3. Proposal for this Public Consultation.....	15
3.1 Conclusions for Public Consideration.....	15
3.2 Specific Proposals for consultation	15
3.3 Making a Submission.....	15

Appendix 1: Services within Contract in December 2019

1. Introduction

1.1 Overview

The National Transport Authority (the “Authority”) is proposing to enter into another direct award contract with Dublin Bus in 2019 for the provision of bus services in the Dublin metropolitan region.

This paper sets out, for the purposes of consultation, the rationale for the Authority’s proposal in relation to the direct award to Dublin Bus of a new contract to operate Public Service Obligation bus services in the Dublin area from December 2019. A direct award contract is one awarded to an operator without competitive tendering, as permissible under national and European Union legislation.

The paper should be read in conjunction with the following papers, which are also publicly available during the consultation period:

- Report on operation of 2014 direct award contract with Dublin Bus
- Technical Report on Contract Options

1.2 Background

The provision of a good quality frequent bus service, properly integrated with other forms of public transport, is of vital importance to the economic growth and social well-being of the Dublin city region and the country as a whole. Buses provide access to workplaces, commercial and retail centres, and are particularly important to those without access to a car. Buses have an important social function in linking communities to each other and to the services they require. Finally, a good quality bus service should encourage more people to travel by bus in preference to the car, reducing the environmental impact associated with car travel.

To address the fact that certain bus services may be socially necessary but not commercially viable the state is allowed under European and national law to subsidise contracts which require operators to deliver, what are called, Public Service Obligations (PSO) services.

The current Public Service Obligation bus services in the Dublin city region are provided by Dublin Bus under a direct award contract with the National Transport Authority and by GoAhead following a competitive tender process. The direct award contract with Dublin Bus expires on 30th November 2019. The Authority must now consider how to provide public bus passenger services in Dublin following the expiry of the current contract. The options to be considered are whether to award another direct award contract to Dublin Bus or to competitively tender all of the Dublin Bus public bus services or pursue a combination of further tendering some services and a reduced size direct award contract for remaining services.

This report examines options in detail and highlights the key issues involved in reaching a decision on a recommended proposal for the bus market in Dublin.

This report concludes with a

- proposal to continue to directly award the contract to Dublin Bus for the operation of a substantial proportion of the Public Service Obligation bus services in Dublin from December 2019.

The Authority has also undertaken a review of the operation of the public bus services to which the 2014 direct award contract relate and has examined the technical contract options open to the Authority. Both reports are available during this consultation period.

1.3 Legislative background

In 2007 **EC Regulation 1370/2007 – on public passenger transport services by rail and by road** was adopted. The Regulation creates a framework regulating how Member States award exclusive rights and pay compensation for transport services which include Public Service Obligations (PSO).

The purpose of the Regulation is to ensure transparency in the award of subvention for public transport services by requiring all PSO transport services to be subject to contracts.

In preparation for EC Regulation 1370/2007 Ireland progressed legislation in two stages, the first involving the enactment of the **Dublin Transport Authority Act 2008 (DTA Act)** and the second involving the **Public Transport Regulation Act 2009 (PTR Act)**.

The result of the enactment of these two Acts was the establishment of the National Transport Authority one of whose principal functions is to “... secure the provision of public

passenger transport services” (section 11(1)(e)(i) of the Act of 2008) by means of entering into public transport services contracts (section 48). In relation to the provision of public bus services, the Act stipulates (section 52) that the Authority has to do so either by means of directly awarded contracts or following a competitive tendering procedure. However, in relation to the services then being operated by Dublin Bus and Bus Éireann, the Act put an obligation on the Authority that directly awarded contracts with the two companies should be for a period of 5 years (section 52).

Three PSO contracts were directly awarded by the National Transport Authority in December 2009 for the operation of public transport services requiring subsidy; to Dublin Bus for the operation of bus services within the Dublin metropolitan area, to Bus Éireann for the operation of bus services elsewhere within the State and to Iarnród Éireann for the operation of rail services nationally. In the case of Dublin Bus and Bus Éireann, the companies identified certain services which they operated on a commercial basis, and these services remained outside the PSO contracts.

The PSO contract between Dublin Bus and the Authority was for an initial period of five years.

The Dublin Transport Authority Act (as amended) requires that where the Authority proposes to enter into subsequent direct award contracts, it may only do so “where it is satisfied that the continued adequacy of the public bus services to which the contract relates can only be guaranteed in the general economic interest by entering into such direct award contracts.”

In 2013, following a review of the operation of this contract, market consultation and statutory consultation with the incumbent operator and other stakeholders including users of the bus services, the Authority decided to directly award the contract for PSO routes in the Dublin metropolitan area to Dublin Bus for a further five year period from December 2014 up to December 2019, with the proviso that during the contract period a number of routes in the outer Dublin metropolitan area amounting to approximately 10% of the overall services in the contract would be removed from the direct award contract and put out to competitive tender.

This tender competition concluded earlier this year (2018), and the contract to operate the outer Dublin metropolitan routes was awarded to Go-Ahead Ireland. The routes will transfer on a phased basis from Dublin Bus to Go-Ahead Ireland between autumn 2018 and early 2019.

In advance of December 2019, the Authority must decide whether or not to directly award some, or all, of the residual bus network in the Dublin Bus contract to Dublin Bus for a further period of five years.

Regulation 1370 also places an obligation on the Authority to ensure that “... *at least one year before the launch of the invitation to tender procedure or one year before the direct award*” that a notice is placed in the Official Journal describing the type of award envisaged and the services and areas potentially covered by the award (Article 7(2)).

Where the Authority proposes to enter into a new direct award contract, section 52(6) of the 2008 Act states that “...*it shall invite and consider submissions from the holder of the direct award contract in question and from any other interested parties, including users of the public bus passenger services that are the subject of the contract.*”

1.4 Objectives

The objectives of the Authority in entering into any public bus services contract are to:

- i. Ensure the provision of high quality and accessible bus services at best value for money to the Exchequer;
- ii. Enable strong monitoring of, and enforcement of compliance by, the contracted operators with the terms of their contracts;
- iii. Improve the customer experience of public transport;
- iv. Ensure public transport integration is not compromised; and
- v. Be compliant with the Dublin Transport Authority Act 2008, the Public Transport Regulation Act 2009, EC Regulation 1370/2007 and EU procurement requirements.

2. Consideration

2.1 Assessment Stages

An assessment of the Authority's options in relation to the procuring of bus services under public bus service contracts in 2019 has been undertaken.

The assessment stages have been:

- Identification of the key requirements of any future bus services contract
- Examination of how best to ensure continued public transport integration;
- Examination of strategic options for contracting bus services in Dublin;
- Consideration of any potential impacts in relation to the incumbent operators and market entrants;
- Review of legal issues;
- Review of impact of wider bus developments in the region on contracting strategy;
- Review of customer satisfaction levels;
- Review of operation of the current direct award contract, and
- Development of proposals in relation to the scope of tendered and/or direct awarded contracts in December 2019.

2.2 Summary of operational and financial performance

The Authority has reviewed the operation of the current contract covering the period from award in December 2014 up to end 2017. In that period, the Authority phased in revised methods of measuring operator performance in relation to reliability, punctuality and customer service quality.

PSO contract performance over the period 2015 to 2017 is set in more detail in Section 3 of the report "Performance Report on Current Dublin Bus Direct Award Contract"

Overall, Dublin Bus achieved a generally good level of compliance with the required reliability and punctuality performance obligations over the three year period 2015 to 2017.

It has also performed well against customer service quality indicators, including revised and updated indicators based on the results of NTA commissioned mystery shopper surveys.

Over the period, scheduled vehicle kilometres operated increased by 0.5%, passenger numbers increased by 14% and revenue rose by approximately 10%. The cost of operating the services rose by €15.8m or 6%. The compensation paid by the NTA to subsidise the operation of services has decreased by €3.7m or 6% between 2015 and 2017. The cost per kilometre operated increased by €0.32 or 6%.

Year	Total Scheduled Vehicle Km¹ [Millions]	Passengers Carried [Million]	Revenue Collected [Million]	Cost of Operations [Million]	Cost/km	Compensation Paid [Million]
2015	47.44	119.82	€205.66	€265.61	€5.59	€57.70
2016	47.14	125.35	€212.08	€276.92	€5.87	€59.56
2017	47.60	136.26	€225.3	€281.37	€5.91	€53.96

¹ Total Vehicle KMs operated – PSO routes only

2.3 Review of Recent Tender Competition

The Authority is carrying out a detailed assessment of the results of the recently completed tender competition for Dublin bus services. At this stage, there are a number of issues that would be need to be taken into account if further open tendering is to be considered. These are:

- a) Whether, or to what extent, there has been cost savings to the Authority through the tendering process;
- b) How the quality of service provided through the competitive tendering compares to that provided through the direct award contract with Dublin Bus;
- c) Lack of access to existing bus depots in CIÉ and no immediate proposals by NTA to provide depot facilities.

The total costs of the facilities being provided by Go-Ahead and the NTA to facilitate the tendered services as well as the cost of the competition have to be offset against the possible savings from Go-Ahead operations to see whether additional value could be achieved from additional tendering of bus services.

The Authority is currently examining the Dublin Bus cost base to get a base operating price that is comparable to the tendered price of Go-Ahead Ireland. There are a number of activities that Dublin Bus carry out that are not required of GoAhead e.g. Marketing, Advertising and depot repairs. The cost of these activities has to be abstracted in order to have a like-for-like comparison. Dublin Bus have suggested that their operating price per km is €4.90 based on 2016 prices.

There is a gap in cost between Dublin Bus and Go-Ahead with a significant part of the cost of the Dublin Bus services being the overhead from C.I.É. of approximately €6m which is unlikely to reduce if there was further competition. It would however, be transferred to a smaller number of PSO services in the Direct Award contracts. Similarly there are other fixed costs e.g. bus depot costs which would remain at similar levels whether tendering happened or not.

Further work is required on evaluating comparative costs. GoAhead have just commenced service operations and it would be prudent for the Authority to have at least two years' operational data available before comparisons between operators are made.

Even so, given the level of difference in Go-Ahead and Dublin Bus costs, there is likely to be additional value to be gained from further competition. However there are wider considerations to be considered.

2.4 Customer Satisfaction

The Authority carries out a biannual customer satisfaction survey which measures satisfaction levels across all subsidised public transport operators and identifies issues that impact on customer satisfaction.

Reliability, punctuality and frequency were strongly viewed as key factors in the provision of a good quality of service. A minimum frequency of service and ensuring a commitment to such a service via strong contractual conditions, as well as ensuring flexibility of a service and its capacity to respond to changes in demand, were regarded as essential.

Dublin Bus has achieved a very high level of satisfaction in a recent customer survey with 34% very satisfied and 61% fairly satisfied, an overall satisfaction rate of 95% which is just one point below the Luas satisfaction rate and is up three points on the Autumn 2017 rating. Reliability, frequency and punctuality satisfaction scores were 93%, 95% and 96% respectively. The perception from customers is that Dublin Bus is delivering in these areas. The performance report would show that improvements can be made in punctuality in particular.

2.5 Integration

Customers strongly advocate better integration including expansion of the real time and Leap card initiatives. Integration of modes through better network planning and timetable connections was another other strong theme.

The experience of the recent tender process highlights that there is significant effort and cost required to maintain the integration of services in a multi-operator environment.

2.6 Bus Connects and the direct award contract

A major reorganisation of the bus network in Dublin is proposed as part of the “Bus Connects” project for implementation in 2020 and beyond. The proposed network has been subject to extensive public consultation during 2018, following which further changes will be proposed. It is not anticipated that the network will be finalised and specified in detail in

advance of the date by which the Authority will award the 2019 contract. For this reason the Authority is proposing to award a contract for the operation of the routes broadly in line with the service level of current Dublin Bus network. After contract award, and once the revised bus network is finalised, the Authority will need to negotiate changes in the contract that take account of the revised bus routes and services.

Early in the lifetime of the new contract, and once the final Bus Connects route network is confirmed, the Authority will need to work with Dublin Bus to amend or revise these routes and service levels to agree with those in the final Bus Connects network. This will require the Authority to negotiate a series of contract service variations with Dublin Bus.

In negotiating these contractual variations the Authority will need to be cognisant of two aspects in particular (1) the variation price Dublin Bus proposes to charge for the change, and whether the required variation can be implemented by Dublin Bus in a manner that provides good value for money to the Authority, (2) the ability of Dublin Bus to commit to the performance requirements for the service, including reliability, punctuality, regularity and customer service quality, and (3) the timescale for implementation of the variation, and whether it can be delivered by Dublin Bus in a manner that fits in with the overall Bus Connects network implementation programme.

If in the opinion of the Authority either route or service level variation costs or implementation timescales proposed by Dublin Bus appear to be excessive, the Authority reserves the right to competitively tender the services in question, in order to expedite the delivery of the Bus Connects service network in a timely and cost effective manner.

The scale of the changes to bus services anticipated in the Bus Connects network, including the introduction of entirely new bus routes in some areas, means that the Authority will need to consider further whether those routes will be added to the Direct Award contract with Dublin Bus or be competitively tendered.

Significant changes to road infrastructure on radial bus corridors are also planned as part of the “Bus Connects” project and are likely to be implemented from 2020 onwards. While these changes should improve run times on many radial routes in the medium term, they are also likely to result in significant disruption to bus journey times in terms of reliability and punctuality whilst the infrastructure upgrades are being constructed.

The Authority considers that there is significant financial risk to it in any negotiation, post contract award, with a bus operator over the cost of service variations of the scale contemplated by Bus Connects. These risks could be substantially larger in the case of a

bus operator who has tendered for the operation of a network that is subsequently radically re-specified shortly after contract award.

The Authority also considers that there is a significant financial risk to it in any post contract award negotiation with a bus operator on additional payments to cover operational costs of revised bus schedules required to maintain contractual performance standards during the construction stage of bus priority infrastructure. These risks could be substantially greater in the case of a bus operator who has tendered on the basis that the bus network is likely to continue to experience similar operating conditions to those seen in historic data.

Alternatively the Authority could indicate to a bidder at tender stage the scale of the infrastructure construction work likely to be undertaken along radial corridors during the contract lifetime, and require the operator to organise services so that punctuality and reliability is maintained to contractual standards at all times during construction. In this case the bidder is likely to take its own view on the likely resources required to maintain reliable and punctual schedules. If there is limited detailed information on the scale or duration of likely disruption, the bidder is likely to price in a significant risk premium into any bid.

It is proposed that the bus routes and service levels included in the December 2019 contract will initially essentially match the current Dublin Bus network at that time.

2.7 General Economic Interest

Section 52(6)(c)(ii) of the Dublin Transport Authority Act 2008 requires that the Authority must be “*satisfied*” that the continued adequacy of the public bus passenger services can “*only be guaranteed*” in the general economic interest by entering into a subsequent direct award contract.

The key advantages associated with competitive tendering of public transport services arise from the effects of competitive pressures and market discipline. By putting a service out to tender, market forces are brought to bear to reveal the most economically efficient provider, thereby leading to lower costs. An enhanced level of customer service quality can also feature as an element of the contract award criteria. Additionally, the presence of a number of operators in a market allows for benchmarking of performance.

Experience from a range of countries supports the contention that competitive tendering of public bus services yields benefits. The results regarding an initial move to competitive tendering are encouraging, although with a cautionary finding that second and subsequent

awards, while still offering cost benefits, can lead to increased unit costs from the first tender. While some of the observed increases can be attributed to developments which would be evident in the scenario without tendering (such as fuel and other cost increases) at least some of the increases represent an erosion of the initial gains through market evolutions such as authorities becoming more specific in their requirements and bidders becoming more experienced. However, the clear finding of the literature is that enhanced value for money is available through a move to competitive tendering.

A further benefit put forward for moving to competitive tendering relates to the potential for enhanced customer service levels. There is evidence of service improvements and the Competition Authority has noted the potential benefits in this regard.

The passenger bus market in Dublin is very large. In 2017, 136 million passenger journeys occurred. This is obviously a major market, and the strategic importance of the functioning of that market to regional and national economic performance has been to the forefront of the Authority's consideration. The costs and risks arising from an ill-considered competition are substantial. Consequently, care must be taken in progressing even if the changes are well proven in other jurisdictions.

Tendering the entire market in one contract is not seen as prudent and would not accord with international practice for initial market competitions. The extent of change that will be brought about in the Bus Connects programme over the next five years and the fact that the market opening that has occurred remains untested, has led the Authority to the conclusion that it is in the general economic interest to direct award to Dublin Bus a contract for services in December 2019 of the same scale that will operate at the end of the current contract.

It is also in interest of the public transport customer that a Gross Cost contract with incentives is introduced as well as further incentives and penalties to enhance customer experience.

3. Proposal for this Public Consultation

3.1 Conclusions for Public Consideration

The Authority considers that the general economic interest would be best served in the coming 5 years by Dublin Bus retaining the same level of services as they will have in December 2019.

3.2 Specific Proposals for consultation

The Authority is obliged to carry out a statutory consultation exercise at a time when it has determined the proposed nature and extent of another proposed direct award contract

This paper has set out, for the purposes of consultation, the background to the Authority's proposal in relation to the direct award to Dublin Bus of a new contract to operate Public Service Obligation bus services in the Dublin area from December 2019, and the rationale behind this proposal. This paper is supported by other documents which can be read when considering the proposals.

The Authority proposes the following:

A new contract for the operation of all services in the Dublin area will be awarded to Dublin Bus on 1st December 2019 for the operation of bus services set out in Appendix 1.

The duration of the Direct Award contract will be for a period of five years until 30th November 2024.

3.3 Making a Submission

The Authority invites written submissions or observations on the above proposals for the Dublin Bus Direct Award contract.

Written submissions and observations may be made by email to 2019buscontracts@nationaltransport.ie or by post to:

Bus Contracts,
National Transport Authority,
Dún Scéine,
Iveagh Court,
Harcourt Lane,
Dublin D02 WT20.

All submissions must include the full name and address of the person making the submission and where relevant the name of the body or organization represented.

All submissions and observations received within the timeframe set out will be taken into consideration.

The closing date for all submissions is Tuesday 30th October 2018 at 5.00pm.

Appendix 1: Services within Contract in December 2019

Scope of contract in Dublin Area with Dublin Bus

- A. The direct award contract will provide the operator with the exclusive right to operate public bus passenger services that it provides in accordance with the provisions of section 7 of the Transport Act 1958 and section 8 of the Transport (re-organisation of Córas Iompair Éireann) Act 1986 within the city of Dublin and the counties of Fingal, South Dublin and Dún Laoghaire- Rathdown and contiguous areas.
- B. Services operated under the contract will be those included in the current contract, and listed in Table A1 and A2 below, allowing for the fact that the Authority may make alterations to elements of the current or new direct award contract which relate to the provision of services contained within the contract, subject to there being no amendment to the scope of the relevant exclusive right referred to in (i) above.
- C. The proposed duration of the contract will be for a period of 5 years.

Table A1:
Services for 2019 Direct Award (excluding Nitelink)

Route	Description
1	Santry (Shanard Rd.) To Sandymount (St. John's Church)
4	From Harristown To Monkstown Avenue
7	From Mountjoy Sq. Towards Loughlinstown
7a	From Mountjoy Sq. Towards Brides Glen Luas Stop
7b	From Mountjoy Sq. Towards Shankill
7d	From Mountjoy Sq. Towards Dalkey
9	From Charlestown Towards Limekiln Ave.
11	From Wadelai Park To Sandyford Business District
13	From Harristown To Grange Castle
14	From Beaumont (Ardlea Rd.) To Dundrum Luas Station
15	From Clongriffin To Ballycullen Rd.
15a	From Ringsend Road (Barrow Street) Towards Limekiln Ave.
15b	From Ringsend Road (Barrow Street) Towards Whitechurch
16	From Ringsend Road (Barrow Street) Towards Stocking Ave.
25	From Dublin Airport Towards Ballinteer (Kingston)
25a	From Merrion Sq. to Lucan (Dodsboro)
25b	From Merrion Sq. To Lucan (Esker Church)
25d	From Merrion Sq. To Adamstown Rail Station
25x	From Merrion Sq. Towards Adamstown Rail Station
26	From UCD Belfield To Lucan
27	From Merrion Sq. To Palmerstown (Cemetery)
27a	From Clare Hall To Jobstown
27b	From Eden Quay Towards Blunden Drive
27a	Eden Quay Towards Harristown
27x	From UCD Belfield To Clare Hall
29a	From Lwr. Abbey St. To Baldoyle (Coast Rd.)
31/a	From Talbot St. To Howth Summit
31b	From Talbot St. To Howth Summit
31d	From DCU Towards Baldoyle
32	From Talbot St. To Malahide
32x	From Malahide Towards UCD Belfield
33	From Lower Abbey St. To Balbriggan
33d	From Custom House Quay / St. Stephen's Green Towards Portrane
33x	From Custom House Quay / St. Stephen's Green To Skerries
37	From Baggot St. / Wilton Terrace Towards Blanchardstown Centre
38	From Burlington Rd. Towards Damastown
38a	From Burlington Rd. To Damastown
38b	From Burlington Rd. To Damastown

39	From Burlington Rd. Towards Ongar
39a	From UCD Belfield Towards Ongar
39x	From Burlington Road Towards Ongar
40	From Charlestown Shopping Centre To Liffey Valley Shopping Centre
40b	From Parnell St. Towards Toberburr
40d	From Parnell St. Towards Tyrrelstown
41	Lower Abbey St. Towards Swords Manor
41b	From Lower Abbey St. To Rolestown
41c	Lower Abbey St. Towards Swords Manor
41x	From UCD Belfield Towards Knocksedan
42	From Talbot St. To Sand's Hotel (Portmarnock)
42d	DCU Towards Portmarnock
43	From Talbot St. Towards Swords Business Park
44	From DCU To Enniskerry
44b	Dundrum Luas Station To Glencullen
46a	Phoenix Park Towards Dún Laoghaire
46e	From Blackrock Station Towards Mountjoy Sq.
47	From Poolbeg St. To Belarmine
49	From Pearse Street Towards Tallaght (The Square)
51d	From Aston Quay Towards Clondalkin
51x	From Dunawley To UCD Belfield
53	From Talbot St. Towards Dublin Ferryport
54a	From Pearse St. Towards Ellensborough / Kiltipper Way
56a	From Ringsend Rd. Towards Tallaght (The Square)
61	From Eden Quay To Whitechurch
65	From Poolbeg St. Towards Blessington / Ballymore
65b	From Poolbeg Street Towards Citywest
66	From Merrion Sq. Towards Maynooth
66a	From Merrion Sq. To Leixlip (Captain's Hill)
66b	From Merrion Sq. To Leixlip (Castletown)
66x	From UCD Belfield To Maynooth
67	From Merrion Sq. Towards Maynooth
67x	From UCD Belfield To Celbridge (Salesian College)
68/a	From Hawkins St. Towards Newcastle / Greenogue Business Park
68x	From Newcastle / Greenogue Business Park to Hawkins Street
69	From Hawkins St. Towards Rathcoole
69x	From Hawkins St. To Rathcoole
70	From Burlington Rd. Towards Dunboyne
70d	DCU Towards Dunboyne
77a	From Ringsend Rd. To Citywest
77x	From Citywest To UCD Belfield
79/a	Aston Quay to Spiddal Park / Park West (79a)
83	From Harristown To Kimmage

84/a	From Blackrock Towards Newcastle
84x	From Hawkins Street Towards Newcastle / Kilcoole
90	From Heuston Station To International Financial Services Centre
116	From Parnell Sq. to Whitechurch
118	From Kilternan Towards Eden Quay
120	From Parnell St. To Ashtown Rail Station
122	From Ashington To Drimnagh Rd.
123	From Walkinstown (Kilnamanagh Rd.) Towards Marino
130	From Lwr. Abbey St. Towards Castle Ave.
140	From Palmerston Park Towards Finglas (Ikea)
142	From Portmarnock Towards UCD Belfield
145	From Heuston Rail Station To Ballywaltrim
150	From Hawkins St. Towards Rossmore
151	From Docklands (East Rd.) To Foxborough (Balgaddy Rd.)

Table A2:
Nitelink services for 2019 direct award contract

Route	Description
7n	From D'Olier St. Towards Shankill
15n	From D'Olier St. Towards Ellensborough
25n	From Westmoreland St. Towards Adamstown
29n	From D'Olier St. Towards Baldoyle Road
31n	From D'Olier St. to Howth
33n	From Westmoreland St. to Balbriggan
39n	From Westmoreland St. Towards Tyrrelstown
41n	From Westmoreland St. Towards Swords Manor
42n	From D'Olier St. Towards Portmarnock
46n	From D'Olier St. Towards Dundrum
49n	From D'Olier St. Towards Tallaght (Kilnamanagh)
66n	From Westmoreland St. Towards Leixlip (Louisa Bridge) via Glen Easton
67n	From Westmoreland St. Towards Celbridge / Maynooth
69n	From Westmoreland St. Towards Saggart
70n	From Westmoreland St. Towards Dunboyne
77n	From D'Olier St. Towards Tallaght (Westbrook Estate)
84n	From D'Olier St. Towards Greystones
88n	From Westmoreland St. Towards Ashbourne